

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**CHRISTOPHER PAUL HASSON,**

**Defendant**

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**CRIMINAL NO. GJH-19-96**

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**CONSENT MOTION TO EXCLUDE TIME PURSUANT TO 18 U.S.C. § 3161**

The United States of America, by and through its attorneys, with the consent of the defendant, hereby requests, pursuant to 18 U.S.C. § 3161(h)(7), an order to exclude the time period between and including **March 13, 2019, and the deadline to be set on the April 3, 2019, status call for the filing of motions**, in computing the time within which trial must commence in accordance with 18 U.S.C. § 3161(c), and in support thereof submits the following:

1. On February 14, 2019, United States Magistrate Judge Gina L. Simms authorized a criminal complaint charging the defendant with violations of 18 U.S.C. § 922(g)(3) and 21 U.S.C. § 844. The following day, the defendant was arrested and an initial appearance was held.

2. On February 27, 2019, a federal grand jury for the District of Maryland returned an indictment charging the defendant with violations of 26 U.S.C. § 5861(d) and (i), 18 U.S.C. § 922(g)(3), and 21 U.S.C. § 844. ECF No. 16.

3. An initial appearance and arraignment on the indictment were held on March 11, 2019. During the arraignment, the parties were apprised of a motions deadline set for April 1, 2019, and a status call set for 5:00 p.m. on April 3, 2019.

4. On March 13, 2019, the defendant moved to extend the deadline for filing motions to a date to be set on the April 3, 2019, status call. ECF No. 21. The defendant cited voluminous discovery as a basis for the motion. *Id.*

5. In accordance with the Speedy Trial Act, 18 U.S.C. § 3161(c), the trial of a defendant charged in an information or indictment shall commence within seventy days from the filing date of the information or indictment, or from the date the defendant appeared before a judicial officer, whichever date last occurs.

6. However, pursuant to 18 U.S.C. § 3161(h)(7), the Court may grant a continuance of speedy trial when the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial. Here, the ends of justice are served by the continuance because defense counsel has stated the need for additional time to review voluminous discovery. On the April 3, 2019, status call, the parties expect to request a date certain for a motions deadline.

7. The Government now respectfully requests that the Court exclude the time from March 13, 2019, through the deadline to be set on the April 3, 2019, status call for the filing of motions, in computing the time within which trial must commence under 18 U.S.C. § 3161(h)(7). This exclusion will provide sufficient time for defense counsel to review discovery and the parties to prepare any pretrial motions.

8. The defendant, through counsel, consents to this motion.

9. For the foregoing reasons, the ends of justice will be served by excluding the requested time in computing the time within which trial must commence pursuant to 18 U.S.C. § 3161(h), and those ends outweigh the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

Robert K. Hur  
United States Attorney

By:                     /s/                      
Thomas P. Windom  
Assistant United States Attorney